

AO 91 (Rev. 11/11) Criminal Complaint

**FILED****UNITED STATES DISTRICT COURT**

FEB 14 2019

for the

Western District of Texas

CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
BY MC DEPUTY CLERK

United States of America )

v. )

(1) Reynol MARTINEZ-De Luna )

(2) Juan Manuel PINEDA-Rodriguez )

(3) Luis Miguel PINEDA-Rodriguez )

Case No. DR:19-M-1829-001,002,003

Defendant(s)

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 02/12/2019 in the county of Terrell in the  
Western District of Texas, the defendant(s) violated:*Code Section*

8 USC 1324(a)(1)(A)(ii)

*Offense Description*

defendants knowingly and in reckless disregard of the fact that certain aliens had come to, entered, and remained in the United States in violation of law, did guide, transport, move, and attempt to guide, transport, and move said aliens within the United States in furtherance of said violation of law, for the purpose of commercial advantage or private financial gain.

This criminal complaint is based on these facts:

\*\*See Attachment A\*\*

☒ Continued on the attached sheet.

Complainant's signature

Arthur Jean, HSI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 02/14/2019

Judge's signature

City and state: Del Rio, Texas

Collis White, U.S. Magistrate Judge

Printed name and title

Attachment A

On February 12, 2019, at approximately 12:40 a.m., Border Patrol Agents (BPA) assigned to the Sanderson, Texas Border Patrol Station observed a black Ford F-150 traveling westbound on U.S. Highway 90 near Dryden, Texas, which is in Terrell County, within the Western District of Texas. The BPAs observed the truck turn north on State Highway 349. BPAs followed the vehicle for approximately 27 minutes and, based on the time of day, the direction of travel, and the appearance of the vehicle being heavily laden, conducted a vehicle stop to perform an immigration inspection.

The BPAs identified themselves and questioned all the occupants regarding their citizenship. The driver of the vehicle, Reynol MARTINEZ-De Luna, was identified as a lawfully admitted permanent resident. The four other passengers inside the passenger compartment were determined to be citizens of Mexico illegally present in the United States. MARTINEZ informed the BPAs there were another four individuals in the bed of the truck, underneath the tonneau cover. BPAs determined those additional passengers were also citizens of Mexico illegally present in the United States. All nine vehicle occupants were arrested and transported to the Sanderson Border Patrol Station.

During an interview with BPA-Intel agents, the driver, MARTINEZ, admitted he had traveled to the area with the intent to pick up the group and transport them to Midland, Texas. MARTINEZ stated he knew the individuals were illegally in the US and that it was also illegal to pick up the individuals. MARTINEZ said he was supposed to be paid \$500.00 USD for each person he successfully smuggled to Midland.

Through additional interviews of the other passengers, BPA-Intel agents identified Juan Manuel PINEDA-Rodriguez and Luis Miguel PINEDA-Rodriguez as the foot guides for the group.

One of the smuggled aliens, Alonso ESPINOZA-Montanez, identified Juan PINEDA and Luis PINEDA as the foot guides.

Two of the smuggled aliens, Omar SANTOS-De La Rosa and Jaime RUIZ-Leyva, identified Juan PINEDA and Luis PINEDA as the foot guides and Reynol MARTINEZ as the driver of the vehicle.

Reynol MARTINEZ, Juan PINEDA, and Luis PINEDA are being charged each with violation of 8 USC § 1324.

Alonso ESPINOZA-Montanez, Omar SANTOS-De La Rosa, and Jaime RUIZ-Leyva are being held as material witnesses.